

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GENERIC DIGOXIN AND DOXYCYCLINE ANTITRUST LITIGATION	MDL NO. 2724 16-MD-2724
THIS DOCUMENT RELATES TO: All Direct Purchaser and End-Payer Actions	HON. CYNTHIA M. RUFE

**SUN PHARMACEUTICAL INDUSTRIES, INC.’S  
INDIVIDUAL MOTION TO DISMISS CONSOLIDATED AMENDED COMPLAINTS**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Sun Pharmaceutical Industries, Inc. (“Sun”) hereby moves for dismissal of Direct Purchaser Plaintiffs’ Consolidated Amended Class Action Complaint (ECF No. 125) and End-Payer Plaintiffs’ Corrected Consolidated Class Action Complaint (ECF No. 175) (collectively, the “Complaints”). As explained in the accompanying Memorandum of Law, none of the Complaints allege sufficient facts to state a claim against Sun.<sup>1</sup>

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<sup>1</sup> Sun also joins in the Certain Defendants’ Motion to Dismiss Direct Purchaser Plaintiffs’ Class Action Complaint and Certain Defendants’ Motion to Dismiss the End-Payer Plaintiffs’ Corrected Consolidated Class Action Complaint, which have been filed contemporaneously with this motion. Sun also incorporates by reference the memoranda of law filed in support of those motions.

WHEREFORE, for all the reasons set forth in their Memorandum, the Court should dismiss the Complaints with prejudice.

Dated: March 28, 2017

Respectfully submitted,

/s/ J. Douglas Baldridge

J. Douglas Baldridge

Lisa Jose Fales

Danielle R. Foley

Venable LLP

600 Massachusetts Avenue, NW

Washington, D.C. 20001

(202) 344-4000

[jbaldridge@venable.com](mailto:jbaldridge@venable.com)

[ljfales@venable.com](mailto:ljfales@venable.com)

[drfoley@venable.com](mailto:drfoley@venable.com)

Thomas J. Welling, Jr.

Venable LLP

1270 Avenue of the Americas, 24th Floor

New York, New York 10020

(212) 307-5500

[tjwelling@venable.com](mailto:tjwelling@venable.com)

*Attorneys for Defendant*

*Sun Pharmaceutical Industries, Inc.*